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11 *Big Little Feelings*

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

14 JENNIFER CARRUTH, individually and on
behalf of all others similarly situated,

15 Plaintiff,

16 v.

17 KD CREATIVES, INC. D/B/A BIG LITTLE
18 FEELINGS,

19 Defendant.

20 Case No. 2:24-cv-02484

21 **DECLARATION OF STARR DRUM IN
SUPPORT OF DEFENDANT'S REPLY IN
FURTHER SUPPORT OF MOTION TO
COMPEL ARBITRATION**

22 [FILED CONCURRENTLY WITH (1)
REPLY IN SUPPORT OF MOTION TO
COMPEL ARBITRATION AND (2)
OBJECTIONS TO EVIDENCE]

23 Date: February 3, 2025
24 Time: 1:30 p.m.
25 Courtroom: 4
26 Judge: Judge Dale A. Drozd

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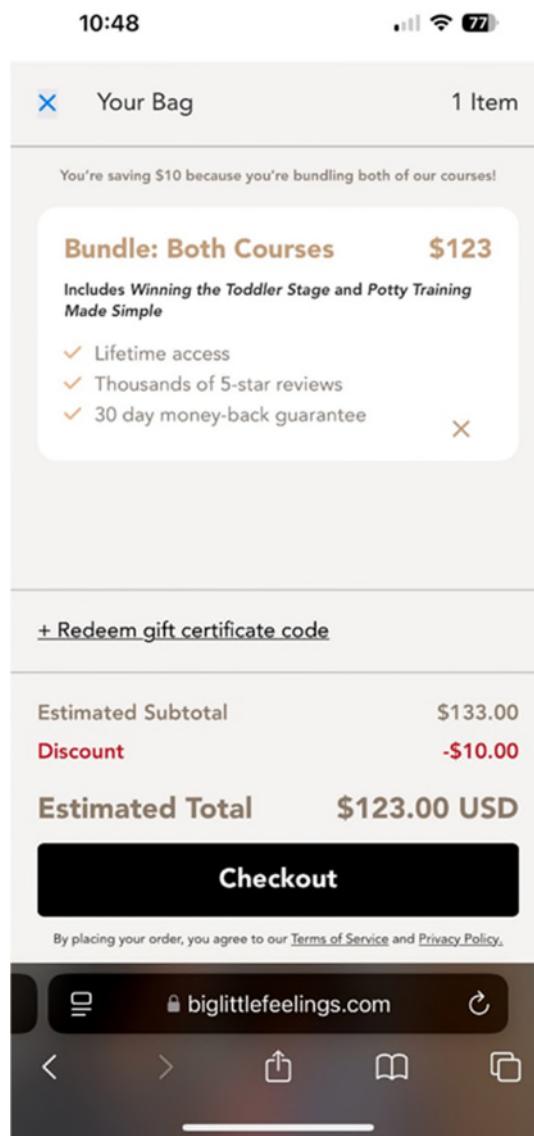
DECLARATION OF STARR DRUM

I, Starr Drum, declare as follows:

1. I am over the age of 18 and if called as a witness would testify as to the matters set forth in this Declaration. I am a member in good standing of the California Bar and of this Court. I am employed as a Shareholder with the firm Polsinelli LLP, and I have been retained by KD Creatives, Inc. d/b/a Big Little Feelings (“BLF”) to represent it in this matter. I have personal knowledge of the following facts and would testify to their truthfulness if called as a witness.

2. I have reviewed Mr. Hedin's declaration and submit this declaration in response.

9 3. Below is a true and correct copy of a screenshot taken by me on January 10, 2025,
10 at 10:48 a.m. CST on my personal iPhone of the checkout screen on BLF's website:



1 4. I did not have to scroll down on this screen to see the phrase below the "Checkout"
2 button reading "By placing your order, you agree to our Terms of Service and Privacy Policy."

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on January 17, 2025.

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7 */s/ Starr Drum* _____
8 STARR DRUM
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